

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	Criminal No. 1:01-CR-00107
v.	:	
	:	Judge William W. Caldwell
BRUCE WARD	:	
	:	(Electronically Filed)

**MOTION TO CONTINUE SUPERVISED**  
**RELEASE VIOLATION HEARING**

AND NOW comes the defendant, Bruce Ward, through his attorney, Thomas A. Thornton, Assistant Federal Public Defender and files this Motion to Continue Supervised Release Violation Hearing and in support thereof the following is averred:

1. On December 6, 2004, Bruce Ward had an initial appearance before Magistrate Judge J. Andrew Smyser.
2. Mr. Ward waived his probable cause hearing and was released on an unsecured bond.
3. A hearing in this matter is scheduled for December 10, 2004.
4. Counsel for Mr. Ward is scheduled to chaperone a fifth grade school field trip to Philadelphia on that date.
5. Counsel for the government, James Clancy, Esquire concurs in the granting of

a continuance but notes that he is unavailable on December 13 and 14, 2004.

WHEREFORE, Bruce Ward respectfully requests that this matter be scheduled for any day other than December 10, 13 or 14, 2004.

Respectfully submitted,

Date: December 7, 2004

/s/ Thomas A. Thornton  
THOMAS A. THORNTON, ESQUIRE  
Asst. Federal Public Defender  
Attorney ID #PA44208  
100 Chestnut Street, Suite 306  
Harrisburg, PA 17101  
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Attorney for Bruce Ward

**CERTIFICATE OF SERVICE**

I, Thomas A. Thornton of the Federal Public Defender's Office, do hereby certify that on this date I served a copy of the **MOTION TO CONTINUE SUPERVISED RELEASE VIOLATION HEARING**, via Electronic Case Filing, or by placing the same in the United States mail, first class in Harrisburg, Pennsylvania, addressed to the following:

James Clancy, Esquire  
United States Attorney's Office  
Federal Building, Room 217  
228 Walnut Street  
Harrisburg, PA 17108  
E-mail: [james.clancy@usdoj.org](mailto:james.clancy@usdoj.org)

Bruce Ward  
1110 Rana Villa Avenue  
Camp Hill, PA 17011

Date: December 7, 2004

/s/ Thomas A. Thornton  
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Attorney for Bruce Ward